

## **Executive Summary**

### **AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)**

#### **1. Introduction**

The Federally-funded Community Development Block Grant (CDBG) Program in the City of Eau Claire is administered by the City's Housing Division. The Federal government provides CDBG Program funding to states, counties and municipalities such as the City of Eau Claire through the U.S. Department of Housing and Urban Development (HUD). The City of Eau Claire was awarded \$560,183 and, in addition, approximately \$100,000 in Program Income (for total resources of \$660,183) to use towards housing, public services and rehabilitation activities that benefit income eligible City residents. The City of Eau Claire will also receive \$314,860 in HOME Investment Partnership funding for the 2021 program year.

CDBG & HOME funds will be directed towards accomplishing the following primary objectives during 2021:

1. Provide decent, safe, sanitary, affordable rental and owner-occupied housing for persons who are income eligible throughout the City;
2. Provide public services for persons who are income eligible and families;
3. Improve and expand emergency shelters, transitional housing facilities, and supportive services for persons without a permanent home, to improve their living situations.

#### **2. Summarize the objectives and outcomes identified in the Plan**

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

#### **SPECIFIC HOUSING OBJECTIVES**

##### **Priority Housing Needs:**

The priority Housing Needs identified via the consolidated planning process include:

1. Renter households with:

- household income less than 50% of the median family income (MFI)
- cost burden greater than 30% of their monthly income

2. Owner households with:

- household income less than 80% of the median family income (MFI)
- homes that do not meet building code, energy, accessibility, or lead paint standards

3. First-time homebuyers with:

- household income between 50% to 80% of the median family income (MFI)
- inability to purchase a home

**Priority Homeless Needs:**

- Affordable Housing
- Transitional Housing
- Emergency Shelter
- Supportive Services
- Health Related care
- Food
- Rental Assistance/Security Deposit
- Job Training/Employment Readiness

**Priority Community Development Needs:**

**Public Facilities & Improvements:**

- General public facilities & improvements

**Public Services:**

- General Public Services
- Youth Services
- Battered and Abused Spouses/Children
- Security Deposits/Rent Assistance
- Employment Training / Readiness
- Crime Awareness
- Health Care Services

Other:

- Direct Homeownership Assistance
- Housing Rehab & Related Programming
- Residential Acquisition for Rehab
- Lead Based Paint Hazards
- CDBG Program Administration

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The City of Eau Claire has had past success in implementing all projects included in the plan. These projects have met all timeliness deadlines and have benefited the low/mod population of the City. As reported in the Consolidated Annual Performance Evaluation Report (CAPER) for Program Year 2020, the City:

#### **Housing**

- Assisted 3 first time homebuyers with down payment closing cost assistance,
- 2 units were purchased by first time homebuyers through direct homeownership assistance,
- 2 new homeowners received rehabilitation loans to rehab their owner-occupied residential units, including the abatement of lead of both units,
- 3 low/mod homeowners received HOME Weatherization Grants (2 – Eau Claire Housing Division & 1 – Western Dairyland),
- 1 single family home was purchased and will be rehabilitated for the Homeownership Program,
- 165 Homes were inspected and brought up to code as a part of the Code Enforcement Program,
- 1 LMI homeowner received funding from the Alley Improvements Reimbursement program.

#### **Public Services**

- 54 persons facing domestic violence sought shelter and support services,
- 154 families received case management assistance to help care for their children,
- 1,073 persons sought emergency shelter as a result of homelessness,
- 673 received primary health care services from the Free Clinic,
- 464 persons received meals from the Community Table soup kitchen,
- 31 households received rental assistance with the Tenant Based Rental Assistance program,
- 520 Hmong households received tenant/landlord counseling and translation services,
- 48 Women and minorities received employment & business start-up services,
- 915 individuals received support services.

### **4. Summary of Citizen Participation Process and consultation process**

## **Summary from citizen participation section of plan.**

**On an annual basis, public input is specifically sought in the following areas:**

1. Action Plan Public Comment Period a 30-day public comment period is held in April/May upon completion of the CDGB funding process and prior to the Annual Action Plan submission in June. Citizens are invited and encouraged to review the Annual Action Plan and provide comments. Any comments received at the public hearing or during the public comment period are included with the plan.

2. A public comment hearing period is held on the Consolidated Annual Performance and Evaluation Report (CAPER) which provides information on the status of performance of CDBG programming and, is held upon completion of the CDBG program fiscal year and completion of the CAPER, in October. Any comments received at the public hearing or during the public comment period are included with the report. Additionally, public notices are published whenever there are any plans and/or report amendments, and plan and/or report submissions seeking public comment. Public comment periods are at least thirty (30) days in length. Public comments are encouraged through meeting attendance or in writing. Citizens who wish to make written comments for consideration by the CDBG application committee may do so by sending their comments to: City of Eau Claire Housing Division, 203 S Farwell St, Eau Claire, WI 54703. All written comments shall receive a written response, where appropriate, within ten days after the meeting at which the matter is considered.

3. During the 2021 Community Development Block Grant (CDBG) application process, the Housing Division held two virtual technical assistance meetings held on February 9, 2021 at 10:00 a.m. and February 17, 2021 at 4:00 p.m. to help applicants complete their CDBG/HOME applications. The Housing Division also held a staff public hearing for comments and questions on the DRAFT 2021 Annual Action Plan by the CDBG/HOME Review Committee. A virtual staff Public Hearing was held April 14, 2021 at 1:00 p.m.

## **5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

Citizen comments and suggestions also were solicited in the Public Meeting agenda. Attendees were encouraged to communicate comments and suggestions regarding development of the 2021 CDBG Annual Action Plan to the City of any time during the Citizen's comment period ending April 17, 2021 via telephone, letters, or through the use of e-mail.

## **6. Summary of comments or views not accepted and the reasons for not accepting them**

Despite efforts to publicize the public hearings/comment period, no further citizen comments were received.

## **7. Summary**

Citizen comments and suggestions were also solicited in the Public Meeting agenda. Attendees were encouraged to communicate comments and suggestions regarding development of the FY 2021, *CDBG Annual Action Plan* to the City at any time during the Citizen's comment period ending April 17, 2021 via written comments or through the use of e-mail.

## PR-05 Lead & Responsible Agencies – 91.200(b)

### 1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	EAU CLAIRE	
CDBG Administrator	EAU CLAIRE	City of Eau Claire Housing Division
HOPWA Administrator		
HOME Administrator	EAU CLAIRE	City of Eau Claire Housing Division
HOPWA-C Administrator		

Table 1 – Responsible Agencies

### Narrative (optional)

The City of Eau Claire has been an Entitlement Community for the Community Development Block Grant (CDBG) since 1977 and the HOME Program since its inception in 1994. The grants are administered through the City of Eau Claire Housing Division. The Housing Division has the primary responsibility for ensuring compliance with all CDBG and HOME program rules and regulations as well as reporting to HUD.

### Consolidated Plan Public Contact Information

## **AP-10 Consultation – 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

The City of Eau Claire Housing Division has, in the past and will continue to work, with the Dairyland Housing Coalition and specifically, Jeanne Semb, the coordinator of the group, to discuss issues as they face the Eau Claire Community.

#### **Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))**

The City of Eau Claire is in constant contact with various agencies to ensure funding priorities are in line with current community development goals. Specifically, the city's various departments, including the City Manager's Office, Housing Authority of the City of Eau Claire, Department of Planning and Community Development and several Community Housing Development Organizations (CHDO). The City is involved in ongoing discussions with the Housing Authority of the City of Eau Claire regarding public housing priorities and needs.

The City of Eau Claire has also worked with the City/County Health Department on various initiatives including Invest Health, HUD's smoking ban and technical assistance to provide a better understanding of funding and how we can continue to positively work together. The Health Department has been very supportive of the Housing Authority's implementation of the ban on smoking.

#### **Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The Housing Authority works with the members of the COC to identify those families and individuals who need housing through referrals and applicant interviews.

#### **Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

The City of Eau Claire does not receive ESG funds.

### **2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction's consultations with housing, social service agencies and other entities**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	EAU CLAIRE HOUSING AUTHORITY
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	The Housing Authority of the City of Eau Claire were contacted through email, newspaper, press release and city website of the public hearings for the CDBG/HOME grant allocations.
2	<b>Agency/Group/Organization</b>	BOLTON REFUGE HOUSE
	<b>Agency/Group/Organization Type</b>	Housing Services-Victims of Domestic Violence Services-homeless Services-Education Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Bolton Refuge House was contacted through email, newspaper, press release and city website of the public hearings for the CDBG/HOME grant allocations.
3	<b>Agency/Group/Organization</b>	WESTERN DAIRYLAND ECONOMIC OPPORTUNITY COUNCIL
	<b>Agency/Group/Organization Type</b>	Housing Services-homeless Services-Employment
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children



	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Western Dairyland was contacted through email, newspaper, press release and city website of the public hearings for the CDBG/HOME grant allocations.
4	<b>Agency/Group/Organization</b>	FAMILY PROMISE OF THE CHIPPEWA VALLEY
	<b>Agency/Group/Organization Type</b>	Housing Services-Children Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Family Promise of the Chippewa Valley was contacted through email, newspaper, press release and city website of the public hearings for the CDBG/HOME grant allocations.

#### Identify any Agency Types not consulted and provide rationale for not consulting

Because Western Dairyland is the lead agency in the preparation of these applications, they determine which groups to participate in the application process. All groups are given the opportunity to collaborate on applications, as long as they have the capacity.

#### Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	WESTERN DAIRYLAND	

Table 3 – Other local / regional / federal planning efforts

**Narrative (optional)**

The City has adequate broadband wiring connections and access in all areas. Consultation with local broadband service providers, as well as response from the community indicate these adequate service levels throughout the jurisdiction.

While primary service is Cable service through Spectrum, there are multiple fixed residential broadband providers that are available to residents of the jurisdiction.

The Emergency Management Division through the City/County Health Department, helps prepare the citizens of the City/County of Eau Claire for natural and manmade incidents. They also collaborate with emergency response agencies city/county-wide to prepare for, respond to, and recover from all hazards. This service is available 24/7, 365 days a year.

## **AP-12 Participation – 91.105, 91.200(c)**

### **1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting**

The City of Eau Claire Housing Division began its citizen's participation process on April 12, 2021 with a newspaper ad in the Eau Claire Leader Telegram. It was followed by a public hearing that was held on Monday, April 12, 2021 at the Eau Claire City Council Meeting. On April 14, 2021, a staff public hearing was conducted virtually to allow public involvement in the plan development process and comments on the proposed allocations.

Public Notices announcing the Annual Action Plan public hearings and comment periods were published both in the local newspaper, the *Eau Claire Leader Telegram*, and on the City of Eau Claire Community Development webpage. A notice was also sent to the local news media (WQOW & WEAU TV Stations and local radio stations), Government/Public Access Channel, the University of Wisconsin Eau Claire (UWEC), City of Eau Claire Library and the City of Eau Claire City Council members. In addition, the City sends direct email notices to the following organizations:

- Bolton Refuge House
- Catholic Charities
- Chippewa Valley Free Clinic
- Children's Service Society
- Eau Claire Police Department
- Family Promise of the Chippewa Valley
- Hmong Mutual Assistance Association
- The Community Table
- Western Dairyland E.O.C., Inc.
- City of Eau Claire Public Works
- City of Eau Claire Public Health Department
- City of Eau Claire Neighborhood Associations

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting	Non-targeted/broad community	The City of Eau Claire held a public hearing for its CDBG/HOME allocations for citizens to comment on the proposed funding by the CDBG/HOME Review Committee. This was held virtually at a scheduled City Council meeting on April 12, 2021. Several people attended the public hearing, including council members and staff.	No comments were received.	No comments received.	<a href="http://www.eauclairewi.gov">www.eauclairewi.gov</a>
2	Public Hearing	Non-targeted/broad community	The City of Eau Claire held a virtual staff public hearing on April 14, 2021 at 1:00 p.m. No public attended the meeting.	No comments were received.	No comments were received.	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Newspaper Ad	Non-targeted/broad community	N/A	No Comments were received.	No Comments were received.	
4	Internet Outreach	Non-targeted/broad community	N/A	No comments received.	No comments received.	<a href="http://www.eauclairewi.gov">www.eauclairewi.gov</a>

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources – 91.220(c)(1,2)

#### Introduction

The City of Eau Claire anticipates receiving the below CDBG Entitlement funds, program income and HOME funds for 2021 to address obstacles to meet underserved needs, foster decent housing, provide public housing improvements and resident initiatives, reduce the number of persons below the poverty line and enhance coordination between public and private housing. The results of these activities will be reported in the Consolidated Annual Performance Evaluation Report (CAPER).

#### Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	\$560,183	\$100,000	0	\$660,183	\$660,183	The City of Eau Claire will use the CDBG funding for various program and projects within the city limits of Eau Claire.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	\$314,860	0	0	\$314,860	\$314,860	The City of Eau Claire will use HOME funds for affordable housing projects.

Table 5 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

One of the requirements the Housing Authority has is that applicants for the CDBG Public Services grantees have additional sources of funding and not rely solely on the CDBG funds. All grantees that are funded, supplement the CDBG grants they receive with funding from other sources.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

The City of Eau Claire will not use publically owned land of property to carry out this 2021 plan.

**Discussion**

There is a limited amount of publicly owned land. Currently, there are no plans to allow the Housing Division or the Housing Authority to use that property to create any Affordable Housing opportunities. Should any properties become available to us, we will attempt to seize such an opportunity to create housing, providing we have or can obtain the necessary financial resources.

The City of Eau Claire Redevelopment Authority is currently working with several developers who are interested in creating more Affordable Housing within the City limits of Eau Claire. The majority of the proposed projects are apartment driven, with interests in renovating historic buildings and more mixed use private and commercial buildings.

Cannery Trails Residences, LLC is set to develop apartments in the Cannery District located in along the west bank of the Chippewa River in downtown Eau Claire. This first phase consisted of creating approximately 6 market rate units. The second phase will produce 40+ units with 85% to 90% of those units being affordable, through the use of Low-Income Housing Tax Credits (LIHTC).

There is also interest with working with a developer, Wired Properties, to create pocket homes within designated LMI neighborhoods. These single-family homes would sell for as low as \$90,000 up to \$200,000. They would create a community within the inner circle of the homes to not only create affordable housing, but encourage getting together with neighbors as a small community.

The City is also in talks with other developers that are interested in developing affordable housing in this and other areas of the city.

As a part of the redevelopment, green or LEED certified projects are being requested as a part of the request for proposals from developers.



## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing	2020	2024	Affordable Housing Homeless Non-Homeless Special Needs	Citywide	Affordable Housing	CDBG: \$400,400 HOME: \$283,374	Rental units rehabilitated: 1 Household Housing Unit Homeowner Housing Rehabilitated: 11 Household Housing Unit Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted Housing Code Enforcement/Foreclosed Property Care: 150 Household Housing Unit
2	Community Resources	2020	2024	Homeless Non-Housing Community Development	Citywide	Public Services Community Facilities	CDBG: \$93,000	Public service activities other than Low/Moderate Income Housing Benefit: 2215 Persons Assisted
3	Employment Opportunity	2020	2024	Economic Development	Citywide	Economic Development	CDBG: \$6,000	Jobs created/retained: 5 Jobs
4	Neighborhoods	2020	2024	Non-Housing Community Development	Citywide LMI Census Tracts	Community Facilities Neighborhood Resources	CDBG: \$30,000	Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit: 50 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Effective Administration	2020	2024	Administration	Citywide	Program Administration	CDBG: \$130,783 HOME: \$31,486	Other: 5 Other

Table 6 – Goals Summary

## Goal Descriptions

1	Goal Name	Housing
	Goal Description	<p>The City is planning multiple activities in this project area to accomplish:</p> <ul style="list-style-type: none"> <li>2 homebuyers provided with financial assistance</li> <li>260 households assisted through TBRA/RRH</li> <li>3 units of rental housing rehabilitated</li> <li>18 units of homeowner housing rehabilitated</li> <li>6 units of ownership housing added</li> <li>Purchase of real estate to serve as transitional housing</li> <li>200 persons assisted in receiving shelter</li> <li>Code enforcement</li> </ul>

<b>2</b>	<b>Goal Name</b>	<b>Community Resources</b>
	<b>Goal Description</b>	<p>The City is planning several activities to accomplish the following through general and public services:</p> <p>180 persons assisted in homelessness prevention services</p> <p>170 persons assisted in non-homeless public services</p> <p>Capital assistance to service providers</p> <p>Health Services</p>
<b>3</b>	<b>Goal Name</b>	<b>Employment Opportunity</b>
	<b>Goal Description</b>	<p>The City is planning activities that will accomplish:</p> <p>5 jobs created or retained through micro-business assistance</p> <p>20 persons assisted in workforce readiness</p>
<b>4</b>	<b>Goal Name</b>	<b>Neighborhoods</b>
	<b>Goal Description</b>	<p>The City is planning activities that will accomplish:</p> <p>Coordinated planning process will expand geographic access to affordable housing opportunity</p> <p>Evolving strategic economic development initiatives</p> <p>Historic Rehabilitation, Alley Reimbursement</p>
<b>5</b>	<b>Goal Name</b>	<b>Effective Administration</b>
	<b>Goal Description</b>	The City will utilize administration funding to meet all other goals and objectives under this plan annually.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

The City's 2021 Annual Action Plan identifies 10 funding projects to be carried out by a range of project partner, as well as 3 projects to prepare for, prevent, and respond to coronavirus.

#### Projects

#	Project Name
1	HOUSING REHABILITATION
2	HOMEOWNERSHIP ASSISTANCE
3	RENTAL ASSISTANCE
4	HOUSING DEVELOPMENT
5	PUBLIC SERVICES AND FACILITIES - HOMELESSNESS
6	PUBLIC SERVICES AND FACILITIES - GENERAL
7	ECONOMIC DEVELOPMENT
8	NEIGHBORHOOD REVITALIZATION/REHABILITATION
9	CODE ENFORCEMENT
10	PLANNING AND ADMINISTRATION

Table 7 - Project Information

#### Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

The City of Eau Claire Housing Division will continue to address obstacles to meeting underserved needs by continuing to service applicants on the Housing Authority waiting list for the Public Housing program and other housing programs they have available. Although, this will not satisfy the entire need, it will help as much as possible. Other agencies such as *Western Dairyland*, *Family Promise of the Chippewa Valley* and *Bolton Refuge House* also receive CDBG and HOME funding to manage Transitional Housing units to provide shelter to homeless families.

The City of Eau Claire Housing Division/Housing Authority is an active participant in the monthly Continuum of Care (COC) meetings. The COC meetings include organizations such as the *Eau Claire City-County Health Dept.*, *Western Dairyland*, *Family Promise of the Chippewa Valley*, *Bolton Refuge House*, *Community Table*, *Salvation Army*, *United Way*, *Eau Claire School District*, *Catholic Charities*, and *Habitat for Humanity*, *Women's Way*, *The Aging and Disability Resource Center*, *Hope Gospel Mission*, *Positive Avenues*, *AIDS Resource Center of Wisconsin* and the *Housing Authority of the City of Eau Claire*.

The City will continue to attend the COC meetings and work with Western Dairyland to conduct a "Point  
Annual Action Plan 20  
2021

in Time Survey" yearly to gather information on community needs and work to address those needs as necessary.

The After-hours Sub-Committee Continues to work on and update the existing plan to aid those homeless individuals find shelter during the overnight hours during times of extreme temperatures (extreme cold or heat). The goal is to coordinate with service providers, law enforcement and other governmental offices so that when someone is found during times of extreme temperatures they can be taken somewhere safe and comfortable overnight or until the threat of those temperature extremes are over. This also eliminates unnecessary emergency room visits as a place to get out of the cold or heat.

The Director of the Housing Division has resigned from the position of Vice Chair of the Dairyland Coalition. He will continue to work closely with the Coalition and participate on the Advisory Committee.

The City, along with other government entities (City & County Authorities, Health Department, Police, Human Services) and services providers (Western Dairyland, Beacon House, Lutheran Social Services, Community Table) and Community partners (Churches, JONAH) will continue working with the Eau Claire initiative to end homelessness and consultant Erin Healy in working on current and future "sprints" to end all aspects of homelessness. The current "sprint" involves housing those individuals that are chronically homeless while continuing to connect them the necessary services. This will be discussed more in our next CAPER.

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	HOUSING REHABILITATION
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$183,000 HOME: \$85,000
	<b>Description</b>	
	<b>Target Date</b>	7/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 11 households will benefit from this program.
	<b>Location Description</b>	This program will provide no interest loans to low and moderate income homeowners in the City of Eau Claire to make repair improvements to their homes that will improve the condition and increase the value of the home and beautify the neighborhoods.
2	<b>Planned Activities</b>	Repairs and improvements that may be funded by this program may include: window and roof replacement, exteriors, lead-based paint hazard mitigation, electrical and heating work, exterior doors, foundation work and insulation. CDBG funds will also be used for the salary of staff delivering the homeowner rehab loan project.
	<b>Project Name</b>	HOMEOWNERSHIP ASSISTANCE
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	CDBG: \$157,000
	<b>Description</b>	Additional funding for purchase and rehabilitation of ownership units for LMI HH including down payment and closing cost assistance.
	<b>Target Date</b>	7/31/2022

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 LMI HH annually.
	<b>Location Description</b>	CDBG funds will be allocated to purchase and rehabilitate single family homes to sell to low-moderate income individuals and provide down payment closing cost assistance to first-time homebuyers.
	<b>Planned Activities</b>	Single-unit home purchase and rehabilitation, down payment and closing cost assistance.
<b>3</b>	<b>Project Name</b>	RENTAL ASSISTANCE
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$151,145
	<b>Description</b>	HOME funding for TBRA program.
	<b>Target Date</b>	7/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	50 LMI HH annually.
	<b>Location Description</b>	Citywide.
	<b>Planned Activities</b>	HOME funding for TBRA program.
<b>4</b>	<b>Project Name</b>	HOUSING DEVELOPMENT
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$47,229
	<b>Description</b>	The Eau Claire Hmong Mutual Assistance Association will use HOME CHDO funds to purchase and rehabilitate one single family home to use for transitional housing for LMI HH.
	<b>Target Date</b>	7/31/2026



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 1-2 HH will benefit from this program.
	<b>Location Description</b>	Targeted area, site identified.
	<b>Planned Activities</b>	Units for assistance of formerly homeless, purchase assistance and rehabilitation of real estate for LMI HH.
5	<b>Project Name</b>	PUBLIC SERVICES AND FACILITIES - HOMELESSNESS
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Public Services Community Facilities
	<b>Funding</b>	CDBG: \$40,300
	<b>Description</b>	Funds allocated to agencies to mitigate or prevent homelessness, including rehabilitation/upgrades to existing facilities.
	<b>Target Date</b>	7/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 2,215 persons will benefit.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Funds allocated to agencies to mitigate or prevent homelessness, including potential rehabilitation/upgrades to existing facilities.
6	<b>Project Name</b>	PUBLIC SERVICES AND FACILITIES - GENERAL
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Public Services Community Facilities
	<b>Funding</b>	CDBG: \$52,700

	<b>Description</b>	Increase accessibility to services and programs for both homeless and non-homeless services, including increased access to public services and connections to resources, expanded resources, and expanded/rehabilitated facilities.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 2,215 persons will benefit.
	<b>Location Description</b>	Citywide
	<b>Planned Activities</b>	Expansion and upgrades to existing facilities, increased access to public services and connection to resources, expanded resources including rehabilitation, expansion, and agency funding.
<b>7</b>	<b>Project Name</b>	ECONOMIC DEVELOPMENT
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Employment Opportunity
	<b>Needs Addressed</b>	Economic Development
	<b>Funding</b>	CDBG: \$6,000
	<b>Description</b>	Expansion and upgrades to existing facilities, increased access to public services and connection to resources, expanded resources including rehabilitation, expansion, and agency funding.
	<b>Target Date</b>	7/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to 25 LMI persons will benefit.
	<b>Location Description</b>	Citywide.
	<b>Planned Activities</b>	Economic development and business startup opportunities.
<b>8</b>	<b>Project Name</b>	NEIGHBORHOOD REVITALIZATION/REHABILITATION
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Neighborhood Resources

	<b>Funding</b>	CDBG: \$5,000
	<b>Description</b>	Alley improvement program that will improve neighborhood areas and access and assist LMI homeowners in special assessments
	<b>Target Date</b>	7/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Area benefit, up to 50 households could benefit.
	<b>Location Description</b>	Citywide.
	<b>Planned Activities</b>	Alley and transportation infrastructure improvements.
	<b>Planned Activities</b>	Alley and transportation infrastructure improvements.
<b>9</b>	<b>Project Name</b>	CODE ENFORCEMENT
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Housing
	<b>Needs Addressed</b>	Neighborhood Resources
	<b>Funding</b>	CDBG: \$85,400
	<b>Description</b>	City-County Health Department Code Enforcement for housing unit's safety and standards.
	<b>Target Date</b>	7/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Up to the exceeding 50 households could benefit through maintaining healthy, safe, and clean living environments.
	<b>Location Description</b>	Citywide.
	<b>Planned Activities</b>	City-County Health Department Code Enforcement.
<b>10</b>	<b>Project Name</b>	PLANNING AND ADMINISTRATION
	<b>Target Area</b>	Citywide
	<b>Goals Supported</b>	Effective Administration
	<b>Needs Addressed</b>	Program Administration
	<b>Funding</b>	CDBG: \$130,783 HOME: \$31,486
	<b>Description</b>	Provide funding for overall administration of programs.

	<b>Target Date</b>	7/31/2022
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Approximately 5 persons will directly be impacted.
	<b>Location Description</b>	Citywide.
	<b>Planned Activities</b>	Funding allocated to assist with program administrative expenses.

## **AP-50 Geographic Distribution – 91.220(f)**

### **Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Funding will primarily be utilized to assist LMI persons and households in the place where they are currently located. This allows fair and balanced opportunity and outreach potential for all LMI HH in the jurisdiction. Facility and infrastructure improvements will be in place (LMI target area) and will benefit LMI HH currently living in those block groups.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Citywide	85
LMI Census Tracts	15

**Table 8 - Geographic Distribution**

### **Rationale for the priorities for allocating investments geographically**

The City of Eau Claire will direct CDBG, CDBG-CV, and HOME funds as best needed to assist LMI persons, families, and households throughout the City. The majority of these funds are directed to program participants through partner agencies, and are not targeted geographically. The remainder are targeted for public improvements in LMI areas.

### **Discussion**

LMI persons, households, and families reside throughout the City, and program funds are allocated to best serve households regardless of place of residence within the City.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

One Year Goals for the Number of Households to be Supported	
Homeless	200
Non-Homeless	180
Special-Needs	50
Total	430

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	50
The Production of New Units	6
Rehab of Existing Units	21
Acquisition of Existing Units	0
Total	77

Table 10 - One Year Goals for Affordable Housing by Support Type

#### Discussion

The City maintains and funds housing programs that serve low-income and residents at-risk of homelessness, including supporting housing funding of local shelter and other homeless services. Aside from homeless services, the main support of residents in the City is through TBRA, which serve between 50-52 households annually.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

Through the public housing agency, the City utilizes all available methods of funding (both public and private) to maintain and expand supply and type of housing options in its portfolio. As new options and opportunities present themselves, the City will continue to assess the best courses of action to improve the lives of residents

### **Actions planned during the next year to address the needs to public housing**

The Housing Authority continually assesses condition of units, and actively works to improve condition as well as improve accessibility of units for residents. Maintenance and upkeep is routine and ongoing to ensure the highest possible levels of service to public housing residents in the community.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

Through program application, the City occasionally funds non-profit partners that develop housing for income eligible households, programs to which public housing tenants qualify. Public housing tenants also qualify for down payment assistance and other low-income ownership programs offered by various agencies.

### **If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance**

Not applicable.

### **Discussion**

The City's housing authority is committed to serving resident households and investment as necessary to ensure safe and sanitary conditions.

## **AP-65 Homeless and Other Special Needs Activities – 91.220(i)**

### **Introduction**

The following are the goals and planned partnerships to serve homeless and other special-needs populations:

**Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including:**

**Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs**

The City works with committed community partners in outreach to homeless persons and persons at-risk of homelessness. Annually a portion of federal funding is allocated to activities that support service delivery to homeless populations including casework and advocacy, housing search assistance, shelter, and all associated services. The City also works with partners to utilize funding that will directly increase the number of units available to persons experiencing homelessness by assisting increased access to housing for LMI individuals and families

**Addressing the emergency shelter and transitional housing needs of homeless persons**

Transitional and emergency needs of persons experiencing homelessness are addressed through service provision partners, especially partners through the CoC. Support is offered through funding, as well as coordination and involvement in CoC meetings and strategic initiatives. The City is an active participant in the CoC and supports the strategic planning goals of the CoC. The CoC and City have also worked together to bring in outside consultants to run “sprint” activities. This activity leveraged local resources to reach goals surrounding homelessness, recently securing housing for 13 of 16 identified homeless individuals on an accelerated timeline.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living is a high priority. This includes shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again has remained a priority of the CoC and City.

The average length of homelessness in the Dairyland CoC is significantly shorter than the average time for the State, indicating general success in initiatives undertaken within the City. Reduction is still necessary, and will be supported through support to CoC members in continuing to apply for State allocated funds including Emergency Solutions Grant to further strengthen RRH programming. The City will continue to support the CoC in application for capital funding to improve the shelter system, funds



for rent assistance, homeless prevention, and eviction services.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again**

Housing instability and frequent entrance/exits from institutions are a known opportunity for continued improvement in the City of Eau Claire. The City will continue to fund non-profit partners that provide services to these populations at-risk of homelessness, and continue to work with the CoC in planning for service provision and outreach. Healthcare-funded housing models are an experimental model, and the City will continue to work with local business and non-profit partners to explore financing and program options that offer an increased range of services to persons exiting institutional systems.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Housing instability and frequent entrance/exits from institutions are a known opportunity for continued improvement in the City of Eau Claire. The City will continue to fund non-profit partners that provide services to these populations at-risk of homelessness, and continue to work with the CoC in planning for service provision and outreach. Healthcare-funded housing models are an experimental model, and the City will continue to work with local business and non-profit partners to explore financing and program options that offer an increased range of services to persons exiting institutional systems. The City also directly supports housing stability through a variety of programs and partners, and will continue to do so with available funding resources.

## **Discussion**

Homeless and special-needs programming is designed to assist those in need, while also securing stability for those facing housing instabilities. The City is committed to continuing and refining these programs as necessary and appropriate to best serve residents of the jurisdiction.

## **AP-75 Barriers to affordable housing – 91.220(j)**

### **Introduction:**

**The following have been identified by the jurisdiction as barriers to housing:**

**Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The City of Eau Claire has been proactive in addressing potential negative effects of public policy. Over the past 10 years, there has been extensive redevelopment in areas of the downtown core. This public-assisted redevelopment was cited by several stakeholders as having adverse effect upon the lowest-income populations in the City, and adjacent neighborhoods were identified as areas having significant amounts of low-income residents and affordable housing opportunity. The City is aware of the potential for continued redevelopment and is currently taking steps to ensure continued access to affordable housing opportunities.

To ensure adequate health and safety of dwelling units within the jurisdiction, the City-County Public Health Department routinely inspects residences in the City. These inspections have worked to advance the supply of adequate housing, ensuring that housing offered and available to residents maintains a safe standard of living for households who reside in these units.

The Eau Claire City Council has recently set aside \$700,000 of funding for affordable housing initiatives through land-banking and financial support for new housing development, which has the potential to significantly impact the supply of available housing to residents of the City, especially low-income home ownership opportunities for residents. The City Council has been supportive and understanding of housing need, and has shown leadership in taking steps to address the issue.

Additionally, a Regional Housing Task Force has recently completed an assessment of housing need within Eau Claire County and the Chippewa Valley, and has put forward recommendations to further availability and access to affordable housing in both the short- and long-term. City staff were members of this task force, as well as community partners and representatives of agencies that work closely with the City of Eau Claire Housing Division.

Per the 2018 Analysis of Impediments to Fair Housing Choice, there are no identified public policies that hinder affordable housing and residential development. There are policies noted that could be implemented, and in some cases already have, such as affordable housing plan development, public engagement/education surrounding multi-unit housing, and TIF extension to fund affordable housing

programs.

**Discussion:**

Federal funding through CDBG and HOME programs is central to the City's effort in removing barriers to affordable housing through programs and development. The City has committed funding to increasing the stock of subsidized affordable units using general levy, of both homeownership and rental unit types.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The following actions and opportunities have been identified by the City through this Consolidated Planning process.

### **Actions planned to address obstacles to meeting underserved needs**

Though the City of Eau Claire is growing in population, households, and investment, there are still individuals and households that remain underserved or unserved by the current market. This creates housing, economic, and community development need for households in the City, and is discussed thoroughly in the Consolidated Plan. Due to the scope of identified needs, the City has chosen to prioritize improvement and development of affordable housing, strengthening stability and livability of neighborhoods, increasing housing stability for those at-risk of homelessness, responding to the needs of individuals and families currently experiencing homelessness, and economic development opportunities for LMI individuals and entrepreneurs. These objectives and goals create spillover effects that help all members of the community, including those who are currently underserved.

### **Actions planned to foster and maintain affordable housing**

The City operates through the Housing Division several strategies aimed at fostering and maintaining affordable housing supply. There actions include:

1. Assisting lower-income households in becoming homeowners
2. Stabilizing households in housing.
3. Improving the condition of existing housing.
4. Developing new income-limited housing.
5. Providing direct housing assistance.

The Housing Division will address the following impediments, as determined through the creation of the last Analysis of Impediments to Fair Housing Choice, during the course of the next year:

### ***1. Need for Additional Support for Non-English Residents***

Demographics show that the City of Eau Claire is becoming more diverse. The City already has a large Hmong population and the percentage of residents who identify as being Hispanic is rising. The need for bilingual speakers and resources is important to reduce the language barrier as an impediment to housing choice. Currently, the City of Eau Claire Housing Authority has access to Hmong and Spanish translation services when needed. An additional language assistance resource is the University of Wisconsin-Eau Claire. The City of Eau Claire Housing Authority provides printed informational materials in Spanish and Hmong.

#### **Recommended Actions**

Update the City of Eau Claire Housing website to include information and downloadable documents in Hmong and Spanish. Utilize interpretation services such as Language Line Solutions that provide interpretation services over the phone to assist residents with limited English proficiency.

### ***2. Ongoing Need for Additional Funding for Affordable Housing***

The City of Eau Claire Housing Authority currently has a waiting list of approximately 300 people for City-owned affordable housing. In 2009, the “Affordable Housing Extension” was added to Wisconsin Tax Incremental Financing (TIF) law that allows communities to extend the life of a TIF District by one year, if all debt has been paid, and use the tax increment for affordable housing.

#### **Recommended Actions**

Coordinate with City of Eau Claire staff to draft a resolution to adopt and extend the life of eligible TIF Districts for the purposes of affordable housing. Work with the City of Eau Claire staff to develop a plan to improve City housing stock funded through the Affordable Housing Extension. Collaborate and support agencies such as the Central Wisconsin Community Action Council (CWCAC), Western Dairyland Community Action Agency and Wisconsin Housing and Economic Development Authority (WHEDA) to provide housing assistance to low to moderate income residents and incentives for developers for low to moderate income housing.

### **Actions planned to reduce lead-based paint hazards**

Lead-based paint mitigation is a focus of the City in housing rehabilitation, and the City will continue to fund and provide programs that mitigate risk in older homes, especially homes with children under the age of 6, including lead assessments in homes that request assistance.

## **Actions planned to reduce the number of poverty-level families**

The City of Eau Claire aims to support housing stability, viable complete neighborhoods, employment opportunity, and support services to LMI households as a general anti-poverty strategy across all Departments and Divisions. Specific to this Plan, the City of Eau Claire works with a variety of community partners whose mission is to improve opportunity and availability of options for lower-income households within the City. These partners and programs allow for increased household and neighborhood stabilization, increasing access and opportunity for communities of place. Inside the City itself, major initiatives have been taken around affordable housing need and production, healthy housing, and income generation. These initiatives work as an anti-poverty strategy through increased ability of residents to secure more of their income toward personal investment, health, and future outcomes for themselves and family members, to decrease health risks which result in more secure employment and educational outcomes, and to continue to expand employment opportunities that can lead to more income generation.

The City has 3 major goals to reduce poverty within the community:

1. Market information and outreach – The City markets resources and services to LMI and poverty-level households, working with non-profit partners to increase access to a range and variety of assistance programs.
2. City and regional service delivery – The City is constantly evaluating effectiveness and efficiency of service-delivery programs in responsiveness to needs of the community. This includes collaboration with the CoC and other service and advocacy organizations, targeted funding in LMI Block Groups and Target Areas, and partnering with other City agencies to improve access, quality of life, and amenity outcomes for residents in LMI areas.
3. Collaborative efforts – The City continually evaluates opportunities to partner with mission-aligned organizations to increase resident access to services. This includes partnership with non-profit service providers, City agencies, regional agencies and other local governments, educational institutions, and the private sector.

## **Actions planned to develop institutional structure**

The City currently has a robust institutional structure for program delivery, though new relationships with nonprofit partners and entities are constantly assessed to further institutional delivery structure. Partner members of the CoC have identified a co-located agency space as a priority need, and the City will work with partner members to determine feasibility of improved space for service operations

## **Actions planned to enhance coordination between public and private housing and social service agencies**

The City will continue to remain active in CoC and other local groups that guide housing services in the

City, including outreach and collaboration with private housing managers, developers, and agents that can enhance affordable housing options for residents

**Discussion:**

In tandem these actions and opportunities will work to help create stable, safe, and suitable environments for residents of the jurisdiction.

## Program Specific Requirements

### AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

#### Introduction:

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	\$330,079
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b><u>\$330,079</u></b>

#### Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	85.00%

#### HOME Investment Partnership Program (HOME)

##### Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

The City of Eau Claire does not invest HOME funds to activities beyond those identified in Section

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92.205 as eligible activities.

**2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows: The City will provide financial assistance up to \$3,300 in the form of a deferred and forgivable loan. This loan is forgiven 20% each of the five years following the loan until it's completely forgiven after continual occupancy. If the homeowner sells the home within that five-year period, the repayment is pro-rated by the number of years they have lived in the house

**3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

The City of Eau Claire will allocate CHDO funding to agencies to purchase and rehabilitated affordable housing units. With each grant, the agency is required to sign a mortgage and promissory note that is filed with the County as a second mortgage on the property. The subrecipient agrees that the note shall become due and payable to the HOME program in the event that either of the following occurs: (a) title to or equitable ownership in the property is transferred to any person or entity other than the subrecipient or (b) the property is no longer occupied predominately by the subrecipient for a housing program occupied by low income persons. In the event that the title to the equitable ownership of the property is occupied predominately by subrecipient for housing programs occupied by low income persons during the affordability period, all payments required under the terms of the note will be forgiven. In the event of a voluntary or involuntary transfer of the property during the loan term, the subrecipient or CHDO will recapture all or a portion of the direct subsidy provided to the homebuyer. This direct subsidy is provided as downpayment assistance in the form of a deferred payment 0% interest loan. If the net proceeds from a voluntary or involuntary sale are insufficient to repay the amount of the HOME subsidy, the subrecipient or CHDO shall recapture the balance due on the loan or 100% of net proceeds from the sale, whichever is less. If there are no net proceeds from the sale, no repayment is required. Net proceeds are defined as the sales price minus superior loan repayment and any closing costs incurred by the homebuyer.

**4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

The City plans not to fund the refinancing of existing debt with HOME funds.